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March 8, 2024

VIA ELECTRONIC CASE FILING

HON. LORNA G. SCHOFIELD

United States District Court Judge

United States District Court

Southern District of New York

500 Pearl Street

New York, New York 10007

Re: Timothy Rodgers v. Mercy College, et. al.

Docket No.: 23-CV-07278

Honorable Judge Schofield,

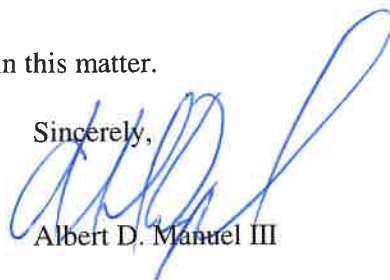
As the record reflects, we are the attorneys for the Plaintiff in the above-referenced matter. We respectfully submit this correspondence in accordance with Your Honor's Order dated March 6, 2024 regarding the status of discovery.

Subsequent Defendant Mercy College's letter regarding discovery, Plaintiff served his demands upon all parties. Although this Court stayed depositions, a Notice of Deposition was also served. Defendants have not communicated with Plaintiff as to what Defendants consider lacking in Plaintiff's responses. However, there have been, and may continue to be, documents which supplement Plaintiff's initial discovery responses.

We look forward to Defendants' responses to Plaintiff's Demands as we work towards completing discovery in a more timely fashion.

We thank the Court for its time and attention in this matter.

Sincerely,



Albert D. Manuel III

ADM:dm